

L P C F C O 5 5 C
(1) (8) (9)

ISSX

OBSERVATION REPORT - SITE INVENTORY NO. 16304529

(11) (18)

St. Clair

CO. - L.P.C.

Region # 5

Date 6/26/81

(20) (25)

Letter Sent (Yes or No) N

(26)

Weather 85° sunny day

Samples Taken: Yes () No (X)

Time: From 10:00 a.m.

Ground Water () Surface () Other ()

To 1:30 p.m.

Photos Taken: Yes () No (X)

Interviewed J. Meyer et al

Inspector P C A

(27) (29)

Previous Inspection

Previous Correspondence

Site Open: Yes () No ()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()

Landfill ()

Storage (X)

E.P.A. Permit ()

Temporarily Closed (X)

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily (1-6) 1

Board Order ()

Illegal (5) (X) 5

(31)

IMPROVED

JUL 07 1981

LPC 4 1/79 5,000

SAME

DETERIORATED

E.P.A. - D.L.P.C.

I S or D

STATE OF ILLINOIS

(62)

GENERAL REMARKS: III Permit Requirements - No change to Hazardous waste has been made since Dec 19, 1980. However, quantities of special wastes shipped prior to this date were received and found to be correct and properly filled out and maintained.

IV Pre-Transport Requirements - The 12 dozen 55-gallon drums containing Phenol by present date. These wastes consist of materials which were received from the impoundments as part of a cleanup plan suggested by the Illinois EPA. Permits were granted for the disposal of this material.

INTERVIEWED

J. Meyer, plant manager of East St. Louis facility

Linda Black - Senior Technician, chemist and responsible for RCR Acceptance

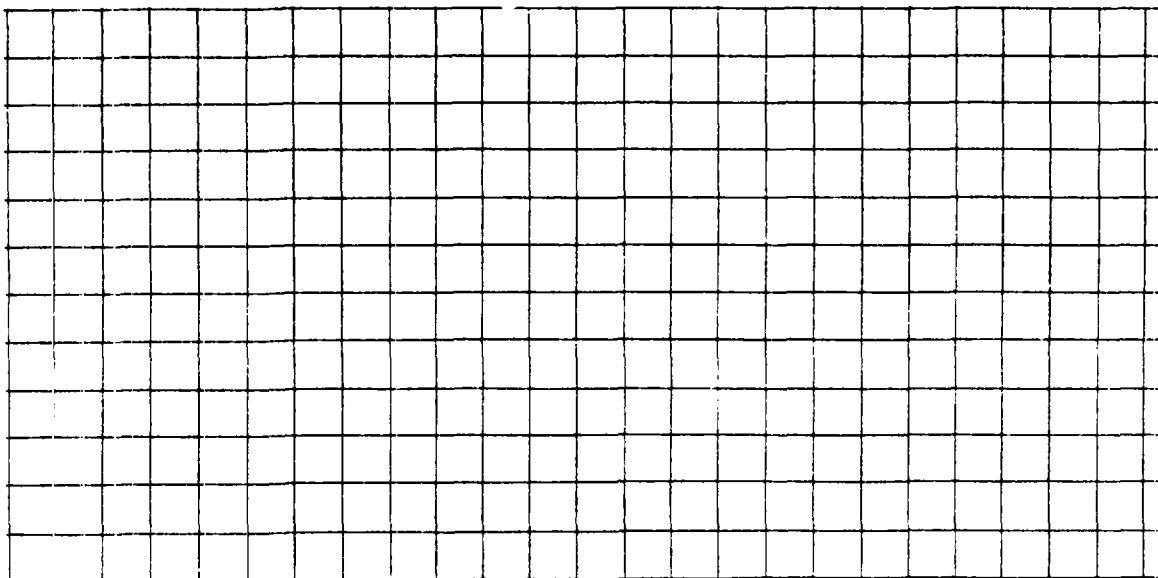
Ron Walchhausen - Manager of facilities & equipment and responsible for RCR also.

Marilyn Nelson - Septic waste treatment facility and Safety worker

Richard Hyink - General Foreman of Facilities

(Continued)

DIAGRAM:



EPA Region 5 Records Ctr.



355974



JUL 07 1981

TO: 2. E.P.A. - D.L.P.C.

STATE OF ILLINOIS

DATE: 6/26/81FROM: ☐ Information onlySUBJECT: ~~St. Clair Co. E. St. Louis~~ / ACF Industries ☐ Response requested
LPC 16304529

(II continued)

~~at~~ a disposal site in Missouri. As transportation plans were being made the United Steel Worker Union (in which ACF employees are members) walked out on strike on March 3, 1981. (The strike had not been resolved as of the inspection date). Transporters have declined to attempt to remove the material during the strike.

Five drums containing creosote were also being stored and were labeled as hazardous. Linda Black-ACF questioned the fact that they had classified this material as hazardous by giving reference to its "declassification." But because the material was found to contain phenols, it was labeled hazardous anyway. These drums were dated March 3, 1981, therefore indicating that the 90 day holding limit had expired. As in the case of the other drums, permits had been granted for their disposal but transporters would not cross the picket lines to remove the barrels. It should be noted that all wastes stored are contained in 55 gal drums. No tanks or intermediate bulk containers are currently utilized at the site.

V Training, Emergency Procedures

Training of all personnel in the handling and dangers of all commodities transported in ACF cars is conducted through the use of a Commodity and Safety Procedures Manual. Employees working with the hazardous material on the plantsite are given extensive training in the use of this manual. However, as of the inspection date personnel training records do not include the requirement listed in part A number 1-6.



TO: _____ JUL 07 1981 DATE: 6/26/81

FROM: _____ EPA -- D.L.P.C. ☐ Information only

SUBJECT: St. Clair Co./J. St. Louis /ACF STATE OF ILLINOIS

V (continued)

B. Preparedness and Prevention

2a. No plant alarm system or whistle exists on site. All foremen carry two-way radios as well as the site plant orange. In the event of an emergency, the foremen are responsible for notifying ~~the~~^{their} crew members and instructing them to carry out emergency safety procedures and also, if need be, to evacuate the area.

3. Testing and Maintenance of Equipment

All equipment used for fire fighting, emergencies, and decontamination are checked quarterly by an outside contracted Safety inspection firm.

C. Contingency Plan, and Emergency Procedure

1d. Equipment is briefly listed in the contingency plan; however, the required capability descriptions and location of each item are not included in the plan.

2. Copies of the contingency plan have not been sent to the East St. Louis Fire Department, i. St. Louis Police Department, or St. Mary's Hospital in E. St. Louis.

IV. Recordkeeping and reporting

This is not applicable because no manifests, except reports etc. have been necessary without having made any other reports of hazardous matter.

General Observations

The



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

ISS
MEMORANDUM

pg. 4

TO: _____ DATE: 6/26/81

FROM: _____ ☐ Information only

SUBJECT: St. Clair Co. v. St. Louis / ACF ☐ Response requested

portion of the facility property which is bounded by a fence. No smoking and Danger signs were posted in the area of the hazardous waste storage area. The closest means of fire protection equipment (chemical portable extinguisher) is approx. 150-200 yds from the storage area. Special waste ~~drums~~ containing drums and drums containing recyclable materials are also currently being stored on-site but are segregated from each other. All drum covers have numerous oil spill ~~protection~~ ^{contaminant} other than seeping the material and contaminated surface material (which appears to be a mixture of kerosene and diesel). Access to the storage area by vehicles may be difficult during inclement weather, as the road way is this same earth-covered material.

Note:

Phone conversation on date 6/29/81 with Irene Alexander determined that Form B Generator Inspection was ^{filled} out just as ACF had notified as ~~an~~ generator, as opposed to Forest.

RECEIVED

JUL 07 1981

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

16304529
STATE IDENTIFICATION NUMBER
(If Applicable)

ILD000273809
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form B Generator Inspection*
(40 CFR Part 262)

RECEIVED

JUL 07 1981

I. General Information:*

E.P.A. - D.L.P.C.
STATE OF ILLINOIS

(A) Installation Name: ACF Industries - Shippers Car Line Division
(B) Street: 100 Tremelly
(C) City: East St Louis (D) State: Illinois (E) Zip Code: 62204
(F) Phone: 618-271-7472 (G) County: St. Clair
(H) Date of Inspection: 6/26/81 Time of Inspection (From) 10:00A (To) 1:30P
(I) Weather Conditions: 85° sunny dry

(J) Person(s) interviewed	Title	Telephone
<u>Marylin Nelson</u>	<u>Sup of waste treatment</u>	<u>618-271-7472</u>
<u>Linda Black</u>	<u>Senior Envir. Chemist</u>	<u>314-723-9600</u>
<u>Ron Wackshausen</u>	<u>Manager Capital Facilities & Equip</u>	<u>314-7231-9600</u>
<u>J.E. Meyer</u>	<u>Manager - Administration</u>	<u>618-271-7472</u>
(K) Inspection Participants	Agency/Title	Telephone
<u>Richard Hyink</u>	<u>General Foreman</u>	<u>618-271-7472</u>

Same as above

(L) Preparer Information

Name	Agency/Title	Telephone
<u>Perry C. Mann</u>	<u>EPA - EPSII</u>	<u>615-343-4606</u>

*Do not use this form if Generator is also a treatment, storage, and/or disposal facility.
Complete form "A" if the Generator is also a TSD facility.

II. BRIEFLY DESCRIBE SITE ACTIVITY

The facility repairs and maintains train cars which are leased to manufacturers for the transportation of bulk commodities. Prior to servicing the cars, the commodity is transferred to another car leaving residuals of the commodity which are then removed by the use of steam. These residues comprise the waste generated. After contained in 55-gal drums the wastes are segregated into hazardous, non-hazardous, or recyclable or easier storage until transported to disposal. Monthly average for haz. waste generation is below 1000 kg although this limit is sometimes exceeded.

III. MANIFEST REQUIREMENTS (Subpart B)

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	—	<u>X</u>	—	<u>No shipments made since effective date</u>
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifests that do not contain the critical elements)				
1. Manifest document number?	—	—	—	<u>N/A</u>
2. Name, mailing address, telephone number, and EPA ID number of generator?	—	—	—	<u>N/A</u>
3. Name and EPA ID Number of transporter(s)?	—	—	—	<u>N/A</u>
4. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	—	—	—	<u>N/A</u>

	Yes	No	NI*	Remarks
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
6. The total quantity of waste(s) and the type and number of containers loaded?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
7. Required certification?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
8. Required signatures?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>
(C) Does the owner or operator submit exception reports when needed?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accord- ance with DOT regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site)	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(C) If required, are placards available to transporter?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(D) Pre-shipment Accumulation:				
1. Are containers marked with start of accumulation date?	<u> </u>	<u>X</u>	<u> </u>	<u>Some drums were not dated</u>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>

*Not Inspected

A 3:

Record the following information:

Tank capacity? _____ gallons

Tank diameter? _____ feet

Distance of tank from property line? _____ feet

(see tables 2-1 through 2-6 of NEPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance)

V Training, Emergency Procedures

	YES	NO	NI*	Remarks
A. Do Personnel training records include: (██████████)				
1. Job Titles?	—	X	—	_____
2. Job Descriptions?	—	X	—	_____
3. Description of training?	—	X	—	_____
4. Records of training?	—	X	—	_____
5. Have facility personnel received required training by 5-19-81?	—	X	—	_____
6. Do new personnel receive required training within six months?	—	X	—	_____
B. Preparedness and Prevention (Part 265, Subpart C)				
1. Maintenance and Operation of Facility:	—	—	—	_____
a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?	—	X	—	_____

2. If required, does this facility have the following equipment?

a. Internal communications or alarm systems?

b. Telephone or 2-way Radios at the scene of operations?

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

Indicate the volume of water and/or foam available for fire control

city municipal water supply and on-site hoses; 50 lb. ABC wheel units; one 150 lb. BC unit and 27 portable BC and ABC units

3. Testing and Maintenance of Emergency Equipment:

a. Has the owner or operator established testing and maintenance procedures for emergency equipment?

b. Is emergency equipment maintained in operable condition?

4. Has owner/operator provided immediate access to internal alarms (if needed)?

5. Is there adequate aisle space for unobstructed movement?

C. Contingency Plan and Emergency Procedure (Part 265, Subpart D)

1. Does the contingency plan contain the following:

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part as applicable)

X — — —

b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?

X — — —

c. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.

X — — —

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?

— X — equipment is listed; exact locations are outlined

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.

X — — —

2. Are copies of the Contingency Plan available at site and local emergency organizations?

— X —

3. Emergency Coordinator

a. Is the facility emergency Coordinator identified?

— X — Plant Manager

b. Is coordinator familiar with all aspects of site operation and emergency procedures?

— X —

c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

— X —

4. Emergency

If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in §265.56?

— X — none has occurred

VI. RECORDKEEPING AND REPORTING
(Part 262, Subpart D)

(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?

— N/A —

(B) Has the generator submitted Annual Reports and Exception Reports as required?

— N/A —

VII. INTERNATIONAL SHIPMENTS
(Part 262 Subpart E)

(A) Has the installation imported or exported hazardous waste?

— X —

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:

a. Notified the Administrator
in writing? _____

b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country? _____

c. Met the Manifest requirements? _____

2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements? _____

VIII. Remarks

REMARKS:

The site currently has a Developmental Permit for a
waste treatment facility, which is in its initial stage of construction. I-EPA
directed ACF to upgrade facility in the recent past when it was found
that unlined surface impoundments were used to store waste. The impoundments
have all been eliminated and the wastes removed. Twelve drums of wastes
from the impoundment clean-up remain presently on-site which are hazardous
(Flammability). The drums were labeled properly except that they were not
dated. Five drums of concrete were also being stored dated March 3, 1981.
No wastes have been transported from the site due to a labor
strike which began on March 5, 1981. Transporters have refused
to cross the picket lines, according to Mrs. Meyer and L. Black. The
surrounding drums have been stored in excess of 90 days as a result of
the situation. Concerning Training, the facility personnel are trained
thoroughly in the handling of hazardous materials by use of a Community
and Safety Procedures Manual which provides extensive information on the
hazards and proper handling procedures for all commodities transported in
ACF leased train cars. Records and job descriptions etc as required during ISS



DATE: April 1, 1980
TO: Division File ✓
FROM: John DeSelm - Southern Region
SUBJECT: St. Clair County - East St. Louis/ACF Industries - Pre-De Inspection

Met with Cliff Metcalf (Environmental Specialist) and Jim Tyler (Plant Manager) at the time of inspection, April 1, 1980.

The topography of the facility is flat. Visibility to the facility is minimal. The nearest neighbor is Continental Grain approximately 200 yards away. The rest of the surrounding area is railroad yards. The facility is approximately 75 yards from the Mississippi River flood wall. The traffic is by rail and since the facility is rather secluded, will pose no traffic problems. No land use problems were observed.

The facilities procedure for waste (as stated to me by Messrs. Metcalf and Tyler): Railroad cars are screened upon arrival as to their need for cleaning. If the cars contain too much of a material or a material on their restriction list (restriction list enclosed), the car is either sent back to the generator or sent to a contractor for cleaning. The facility is not designed or meant to be a waste treatment facility. Cars are only cleaned so repairs can be made. Approximately one-third to one-half of the cars require some cleaning. Most cars contain less than 1% waste. When cleaning, if a material can be removed by the lower valve, it is drained into 55 gallon drums. The drums will be disposed in a permitted site under permit. Then, if the material is deemed innocuous, the car is cleaned and the waste will enter the proposed wastewater treatment system. If the material to be drained, or car to be cleaned contains or had contained any waste deemed hazardous, the drained waste and/or waste from cleaning will be containerized in 55 gallon drums for disposal at a permitted secure landfill (under IEPA permit). Presently, SCA, NECO, and Waste Management have been contacted for bids concerning disposal at secure sanitary landfills.

JJD:jlr

cc: Southern Region
Bill Child - FOS Manager
Tom Cavanagh - Permit Section

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APR 7 1980

E.P.A. — D.L.P.C.
STATE OF ILLINOIS